

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs and Defendants Google, LLC and YouTube, LLC (together, “YouTube” or “Defendants”) to finalize search term negotiations from May 31, 2024 to June 7, 2024, with any necessary letter briefing to be submitted five business days thereafter (and no later than June 14). The parties declare in support of this request:

1. Plaintiffs and YouTube are engaged in ongoing search term negotiations relating to Plaintiffs’ already served Requests for Production.

2. Plaintiffs and YouTube mutually agree that they would benefit from more time to continue their conferrals and attempt to narrow disputes regarding search terms.

3. Plaintiffs and YouTube believe that an extension until June 7 to finalize negotiations will afford adequate time for such negotiations.

4. Extending this deadline will not affect any other deadline affixed by the Court.

5. This is the second request to extend this deadline.¹

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline for Plaintiffs and YouTube to finalize search term negotiations to June 7, with any necessary letter briefing to be submitted five business days after the parties complete those discussions (no later than June 14).

IT IS SO ORDERED,

DATED: _____

PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

IT IS SO STIPULATED AND AGREED.

¹ Pursuant to DMC Order No. 6 (ECF 875), the Court originally ordered that search term discussions *and briefing* be concluded by May 31, 2024. On May 23, 2024, the parties requested, and the Court granted on the record, a modification to the order that discussions be concluded by May 31, 2024 but that briefing would be concluded by June 7, 2024. *See* May 23, 2024 Hr’g Tr.

1 Respectfully submitted,

2 DATED: May 31, 2024

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ATTESTATION

I, Audrey Siegel, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 31, 2024

By: /s/Audrey Siegel
Audrey Siegel